

APR - 6 2018

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

JULIA G. DUDLEY, CLERK  
BY: *A. Baylock*  
DEPUTY CLERK

United States of America  
v.

Eun Soo Lee

*Defendant(s)*

Case No. *1:18mj52*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 5, 2017 in the county of Louisa in the  
Western District of Virginia, the defendant(s) violated:

*Code Section*

18 USC 875(c)

*Offense Description*

Transmit in interstate commerce any communication containing a threat to  
injure the person of another

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*telephonically.*

Sworn to ~~before me and signed in my presence.~~

Date: 04/06/2018

City and state: Abingdon, Virginia

*[Signature]*

*Complainant's signature*

John Gallo, Special Agent

*Printed name and title*

*[Signature]*

*Judge's signature*

Hon. Pamela Meade Sargent, US Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL  
COMPLAINT AND ARREST WARRANT.**

I, John Gallo being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the United States Capitol Police (USCP), where I have served since January 1990. I am currently assigned to the Investigations Division, Threat Assessment Section. My duties and responsibilities, among other things, include investigating threats made to federal officials. I have attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received training and gained experience in search warrant and arrest warrant applications. I have participated in numerous investigations into threats against members of Congress to include violations of Title 18, United States Code (U.S.C.), Section 875(c)

2. The facts set forth below are based upon my own observations, investigative reports and information provided to me by other law enforcement agents. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

3. On or about May 5, 2017, the Facebook user "Fwafefewawe Gawefawef" sent the following threatening message to U.S. Representative TG's Facebook account:

"Isn't the internet great. It allows shithheads like yourself to say shit that would, in real life get your head cracked open.

Hopefully you'll suffer the same fate fucking cunt.

Please turn to the loaded gun in your drawer, put it in your mouth, and pull the trigger, blowing your brains out. You'll be doing the whole world a favor. Shitbag.

I would love to smash your face in until it no longer resembled anything human, faggot.

Die painfully okay? Prefeably by getting crushed to death in a garbage compactor, by getting your face cut to ribbons with a pocketknife, your head cracked open with a baseball bat, your stomach sliced open and your entrails spilled out, and your eyeballs ripped out of their sockets. Fucking bitch

I would love to kick you hard in the face, breaking it. Then I'd cut your stomach open with a chainsaw, exposing your intestines. Then I'd cut your windpipe in two with a boxcutter. Hopefully you'll get what's coming to you. Fucking bitch

I really hope that you get curb-stomped. It'd be hilarious to see you begging for help, and then someone stomps on the back of your head, leaving you to die in horrible, agonizing pain. Faggot

Shut the fuck up faggot, before you get your face bashed in and cut to ribbons, and your throat slit.

You're dead if I ever meet you in real life, fucker. I'll fucking kill you.

I would love to fucking send your fucking useless ass to the hospital in intensive care, fighting for your worthless life.

[HTTP://WWW.YOUTUBE.COM/WATCH?V=NZXGOFYE7HS&FEATURE=RELATED](http://www.youtube.com/watch?v=NZXGOFYE7HS&FEATURE=RELATED)

I wish you a truly painful, bloody, gory, and agonizing death, cunt."

4. The Government obtained certain business records from Facebook for the user account "Fwafefewawe Gawefawef". These records indicated (a) the IP address used to register the account was 45.50.76.76 [this IP address is owned by Time Warner/Charter Communications], (b) the IP addresses used at the time of the threats were hosted by Cyber Ghost [Cyber Ghost is a VPN provider used to access the internet anonymously], (c) the registered email address was [pakcho4i3876@gmail.com](mailto:pakcho4i3876@gmail.com), and (d) the registered telephone number was 17146990183 [the provider for that number is Verizon Wireless].

5. The Government obtained certain business records from Time Warner/Charter Communications for the subscriber of the IP address. These records showed the account subscriber was Eun LEE, residing at 9059 Grand Cir, Cypress, CA 90630.

6. The Government obtained certain business records from Verizon Wireless for the account subscriber for 17146990183. These records show the subscriber of the account is Gab S. Lee, residing at 9059 Grand Cir, Cypress, CA 90630.

7. USCP Agents interviewed Representative TG, who stated that he was in his residence located in Louisa County in the Western District of Virginia when he received the Facebook message on his phone. Representative TG stated he felt directly threatened and is concerned about his safety as well as his family's safety. I am aware that a message posted on Facebook travels in interstate commerce prior to being viewed by a user in Virginia

8. On or about May 22, 2017, staff for Representative TG, reported to USCP an email that was sent to the office via Web Form on May 4, 2017. The name, email address, and message content was verbatim to the Facebook threat that was sent on May 5, 2017.

9. The IP address used to send the email belongs to Cypress College. USCP Agents contacted the IT department for the College, who stated they were unable to determine the specific user for the date and time the email was sent. The IT department further stated the public is able to log into their system as a guest user. Your affiant knows that LEE's residence is adjacent to the Cypress College campus.

10. On or about July 13, 2017, your affiant interviewed LEE at his residence located at 9059 Grand Cir, Cypress, CA 90630. LEE admitted sending the threatening messages to

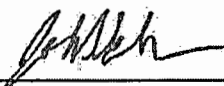
Representative TG. LEE stated that he sent the threats because he was frustrated with Representative TG's political views. LEE stated he could understand how the Congressman would be in fear after receiving the threat. LEE admitted that if he or his family received similar messages he would be scared and frightened, and would report to authorities. LEE also admitted to sending similar threatening messages to other elected officials. LEE provided consent for Agents to search his computer.

11. A forensic review of LEE's computer shows internet history of Facebook logins to user account "Fwafefewawe Gawefawef" on May 5, 2017. The computer also shows internet history of google searches for Congressman TG. Additionally the computer has the program Cyber Ghost 6 installed in the program files.

### CONCLUSION

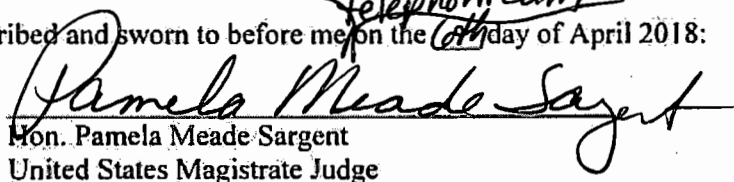
12. Based upon the above information, there is probable cause to believe that Eun So LEE, did on or about May 5, 2017, transmit in interstate commerce a threat to injure the person of another, namely, to kill U.S. Representative TG.

Respectfully submitted,



John Gallo  
Special Agent  
United States Capitol Police

Subscribed and sworn to before me on the 6th day of April 2018:



Mon. Pamela Meade Sargent  
United States Magistrate Judge